

Legal Notice

From:

Jeffery Battle
P.O. Box 448
Laurel, MD 20725
Email: jefbttl@hotmail.com
Phone: (301) 613-6104

04/17/2023

Page 1 of 3

To:

Microsoft Corporation Reginal Agent:
DLA Piper LLP (US)
650 South Exeter Street, Suite 1100
Baltimore, MD 21202-4576
ATTN: Brett Ingerman (Bar No. 23037)
Tel: (410) 580-3000
Fax: (410) 580-3001

USDC - GREENBELT
'24 APR 18 AM 10:45

HD

Rcv'd by: AV

RE: Jeffery Battle (Plaintiff) vs Microsoft Corporation (Defendant) – civil case: 1:23-cv-01822, Cease & Desist - Third Notice to Defendant

To Attorney Brett Ingerman:

This Cease & Desist, third notice, is about Plaintiff Jeffery Battle concerning his name and autobiography entitled “The Aerospace Professor: The Man and The Brand”. Accordingly, please direct all correspondence to the Plaintiff and the United States District Court of Maryland.

Microsoft through its “Microsoft Bing” search engine, has engaged in the act of defaming Mr. Battle, and other claims, propagating false information about Mr. Battle that could have a substantial impact on his personal and professional life, personal property, and livelihood. For context, Mr. Battle is an author, professor, President and Chief Executive Officer (CEO) of his company, Battle Enterprises, LLC, and subsidiary The Aerospace Professor Company, a United States military veteran, and journalist, who is in the process of promoting his new autobiography, intellectual property brand (Logo), among other personal and public business ventures. From May 2023 until the present, Microsoft, through their search engine Bing, has generated false statements conflating Mr. Battle with a person of a similar name, Jeffrey Leon Battle, who is a convicted terrorist, to the professional and personal detriment of Mr. Battle and his family. Please note that the distinction between Mr. Battle and Jeffrey Leon Battle is in the spelling of their first name and Plaintiff has no middle name.

Recently, Mr. Battle discovered that Microsoft's “Microsoft Bing” search engine, is generating false information connecting and associating Mr. Battle and his autobiography “The Aerospace Professor: The Man and The Brand” with Jeffrey Leon Battle a convicted terrorist. Second, the Microsoft Bing search is connecting and associating, Mr. Battle, with an associate of Jeffrey

Leon Battle named Patrice Lumumba Ford, who is also a convicted terrorist and an associate of Jeffrey Leon Battle.

First issue, when someone uses Bing and searches Plaintiff name “Jeffery Battle” in Bing, the “Related Searches” lists Patrice Lumumba Ford. Selecting or clicking on Ford’s name takes you to a webpage that states:

1. “Patrice Lumumba Ford has been accused of membership in a terrorist group dubbed the Portland Seven, members of which attempted to travel to Afghanistan shortly after 9/11 in order to aid the Taliban”. (emphasis added) *See Attachment A – dated 4/17/2024, pages 1 and 2.*

The *second* issue is when someone searches Plaintiff’s autobiography in Bing “The Aerospace Professor autobiography” the “Related Searches” list shows convicted terrorist “Jeffrey Battle” and makes him appear to be the author. The page has four images of Plaintiff’s personal property including his autobiography and logo. Selecting or clicking on terrorist Jeffrey Battle’s name under “Related Searches” takes you to a webpage that states:

2. “Jeffrey Leon Battle was a member of a terrorist group dubbed the Portland Seven, some members of which attempted to travel to Afghanistan shortly after 9/11 in order to aid the Taliban...” (emphasis added) *See Attachment B – dated 4/17/2024, pages 1 and 2.*

For nearly a year, Microsoft has continued numerous different types of false activities, labeling the plaintiff and his personal property as terrorist and terrorist owned. First, these reports falsely, materially, and detrimentally connect and imply that Jeffrey Leon Battle a convicted terrorist, is the author of Plaintiff’s autobiography “The Aerospace Professor: The Man and The Brand” and is the owner of his intellectual property brand (Logo). Secondly, Microsoft falsely, materially, and detrimentally connected and implied that Plaintiff is an associate of Patrice Lumumba Ford, who is also a convicted terrorist.

These false connections through Bing “Related Searches”, which are directly attributed to Mr. Battle and his personal property through Microsoft “Bing”, have, and will continue, to severely damage Mr. Battle’s professional and personal reputation, harm his personal property, and could lead to threats of violence against him and his family. While Mr. Battle has been dealing with this false attribution of facts to his name and property for nearly a year, he is attempting to promote his autobiography, intellectual property (log), and other business endeavors. In light of these false statements, Mr. Battle has ceased marketing, promotions, and business sales activities related to his new book, intellectual property, and other private business endeavors, to his own financial, personal, and professional detriment.

Mr. Battle attempted to go through the appropriate measures and processes to communicate with Microsoft before engaging in a civil action. The Plaintiff has numerous years of experience in technology and has an engineering Bachelor of Science degree. He believes that there is AI manipulation involved. *Again, please contact the Federal Bureau of Investigation (FBI) because your numerous false and extremely different and unique activities to harm Mr. Battle appears to*

be human programmer-assisted and not solely Artificial Intelligence (AI) developed and generated.

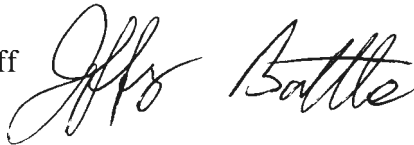
As such, Plaintiff hereby demands that Microsoft immediately cease-and-desist from defaming and committing other unauthorized actions against Mr. Battle, remove all references to Mr. Battle that connect, conflate, or associate his identity with convicted terrorists, and remove the Bing “Related Searches” reporting depicting Mr. Battle and his personal property, autobiography, and intellectual property, as terrorist owned, and “Related Searched” activities associating him with other convicted terrorists.

Mr. Battle is entitled to seek monetary damages and equitable relief. This is the third cease-and-desist notice forwarded to the defendant, and the Plaintiff has been attempting to resolve this matter through communications with the defendant since May of 2023. Plaintiff will pursue all available legal remedies, including seeking monetary damages, injunctive relief, and other relief according to the civil complaint, and new detrimental information included in all the cease-and-desist notices, which could result in considerable liability to you.

Please respond to the Plaintiff and Maryland District Court immediately concerning this and other cease-and-desist notices.

Regards,

Jeffery Battle, Plaintiff

A handwritten signature in black ink, appearing to read 'Jeffery Battle', written over the printed name.

ATTACHMENTS:

- A. Microsoft's “Bing” search; “the aerospace professor autobiography” false reporting connecting, associating Plaintiff’s personal property through Bing “Related Searches” to “Jeffrey Battle” a convicted terrorist.

- B. Microsoft's “Bing” search; false reporting through Bing “Related Searches” connecting, associating Plaintiff with convicted terrorist “Patrice Lumumba Ford.”

NOTE: This document and attachments have been forwarded to Defendant by FedEx Next Day Delivery Mail – Signature Confirmation, and Hand delivered to the United States Maryland District Court

P. 1 of 2



CIRCUIT COURT FOR Anne Arundel County

, MARYLAND

City/County

Located at 6500 Cherrywood Lane, Greenbelt, MD 20770

Case No. 1:23 -cv-01822

Court Address

Plaintiff

Jeffery Battle

Address

P.O. Box 448, Laurel, MD 20725

City, State, Zip

(301) 61306104

Telephone

vs.

Microsoft Corporation / DLA LLP

Defendant

650 South Exeter Street, Suite 1100

Address

Baltimore, MD 21202-4576

City, State, Zip

(410) 580-3000

Telephone

CERTIFICATE OF SERVICE

I certify that on this 18 day of April, 2024, a copy of the
 document(s) titled Legal Notice - Cease & Desist - Third Notice to Defendant
 Title(s) of document(s)

ATTN: Brett Ingerman, Attorney

was/were ☒ mailed, postage prepaid ☐ hand delivered, to:

Name

Address

City, State, Zip

Name

Address

City, State, Zip

Date

Signature of Party Serving

P. 2 of 2



14225 Baltimore Ave
Laurel, MD 20707-5011
301.725.4933

April 18, 2024 10:20 AM
Receipt #: CGSKS00802092

FedEx Express \$47.81
FedEx Priority Overnight
776010558655

Recipient Address

DLA PIPER LLC (US)
ATTN: BRETT INGERMAN
650 S EXETER ST
STE 1100
BALTIMORE, MD 21202-4576, US
410-580-3000

Scheduled Delivery Date: 04/19/2024

Pricing Option: Standard Rate

Package Information: FedEx Envelope

Additional Services:

Adult Signature Required

Package Weight: 0.15 lb (S)

Declared Value: \$1

Express Subtotal	\$47.81
Tax	\$0.00
Total	\$47.81

***** PURCHASE *****
APPROVED